



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

MARK D. ZUCKERMAN  
Senior Counsel  
E-mail: mzuckerm@law.nyc.gov  
Phone: (212) 356-3519  
Fax: (212) 788-9776

May 20, 2022

**VIA ECF**

The Honorable Lois Bloom  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Patricia Ranta, et. al. v. City of New York, et. al., 14 Civ. 3794 (FB)(LB)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York and Stephen Chmil in the above referenced matter. We write in accordance with Your Honor's order of May 10, 2022 as to the newly disclosed witnesses, as well as to respectfully request (on consent) that expert discovery be extended through September 30, 2022.

First, with respect to the newly disclosed witnesses as set forth in plaintiffs' letter to the Court at Docket 108 herein, we note that in plaintiffs' late disclosures, an address and telephone number has only been provided for Jessica Wilson (John O'Mara, Taylor Koss and Patrick Lanigan have already been deposed). Thus, for the 16 other newly disclosed witnesses, plaintiffs have not provided addresses or telephone numbers with their disclosures in accordance with Rule 26(a)(1)(A)(i). We respectfully request that plaintiffs be ordered to provide such information to us by June 3, 2022, if they are going to call these witnesses at trial, so that we can attempt to serve any such witnesses that we wish to depose with deposition subpoenas. Defendants respectfully request until August 19, 2022 to take any additional depositions of the newly disclosed witnesses.

Second, counsel for the parties have conferred with respect to expert discovery and propose the following extended schedule for the Court's approval: 1) Plaintiffs' expert reports and other Rule 26(a)(2) disclosures-June 15, 2022; 2) Defendants' reports and other Rule

26(a)(2) disclosures-August 31, 2022; 3) Completion of expert depositions and discovery-September 30, 2022.

From defendants' standpoint, the requested extensions of expert discovery are necessitated by the fact that we will not have plaintiffs' reports until June 15, 2022. Plaintiffs have already indicated that they will be calling an expert psychologist to testify as to all three plaintiffs. (as well as a police practices expert) I have reached out to potential psychological experts, but a final decision on which one to use will need to be made after plaintiffs' reports are produced, in the interest of efficiency and preserving economic resources. Thereafter, psychological tests of plaintiffs will likely have to be performed by our psychological expert, and the reports prepared. As such, the additional time, as agreed to with plaintiffs' counsel, is necessary for both sides. We note that under the previous schedule, plaintiffs were to produce their reports and disclosures by May 16, 2022.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman  
Senior Counsel

cc: All Counsel (via ECF)